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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

HOWARD B. HIGGINS, an individual,
Plaintiff,

vs.

FARR FINANCIAL INC., a California
Corporation, ZENITH INVESTMENT
GROUP LLC, a California Limited
Liability Company, AMAECHI
GEORGE OZOR, an individual, and
JOHN/JANE DOES I-X, individuals or
entities whose identities are unknown,
Defendants.

Case No. C 07-02200 JSW

**STIPULATION AND
PROPOSED ORDER**

1 Defendant, Farr Financial, Inc. ("Farr") and Plaintiff, Howard B. Higgins, by and
 2 through their respective attorneys, submit this stipulation, in which they agree as follows:

3 Plaintiff's reply in support of Plaintiff's summary judgment motion, filed May 6,
 4 2011 (Docket No. 165), currently due filed by June 3, 2011 [see Order re Stipulation to
 5 Continue Hearing Date, filed April 20, 2011 (Docket No. 155)] may be filed on or before
 6 June 9, 2011.
 7

8 Good cause exists to grant this stipulation. Plaintiff's counsel previously stipulated
 9 to allow counsel for Farr Financial additional time to file an opposition to Plaintiff's
 10 summary judgment motion, and pursuant to that stipulation, the Court granted Farr until
 11 May 31, 2011 to file its opposition and ordered Plaintiff's reply filed by June 7, 2011.
 12 However, Plaintiff's counsel had other client matters that arose last week which had to be
 13 attended to immediately, and could not be postponed pending completion of the reply due
 14 in this matter. Plaintiff's counsel is still attending to those matters.
 15

16 There have been no prior requests to continue the filing date for Plaintiff's reply.
 17 Moreover, there are no other deadlines or events in this case that would be impacted by the
 18 requested relief.
 19

20 IT IS SO STIPULATED.
 21

22 Dated: June 6, 2011

NORMAN G. REECE, P.C.

23 By: /s/
 24 NORMAN G. REECE, JR.
 25 Attorney for Plaintiff, Howard B. Higgins
 26 (Pro Hac Vice)
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Dated: June 6, 2011

HOWARD J. STEIN & ASSOC.

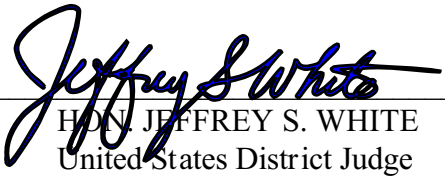
By: /s/
HOWARD J. STEIN
Attorneys for Defendant, Farr Financial, Inc.
(Pro Hac Vice)

ORDER

Good cause appearing, **IT IS ORDERED** that the stipulation is **GRANTED**. Plaintiff shall have up to and including June 9, 2011, to file a reply in support of Plaintiff's summary judgment motion (Docket No. 165).

IT IS SO ORDERED.

Dated: ~~May~~ June 7, 2011


HON. JEFFREY S. WHITE
United States District Judge